



101 South Salina Street, Suite 400
Syracuse, New York 13202
Telephone: (315) 425-9000
Facsimile: (315) 425-9114

Robert E. Purcell
E-Mail: rpurcell@wallmarjama.com

November 28, 2005

FILED ELECTRONICALLY USING CM/ECF

Honorable Gustave J. DiBianco
United States Courthouse
PO Box 7396
100 South Clinton Street
Syracuse, New York 13261

**Re: Haritatos v. Hasbro, Inc. et al.
Civil Action No. 05-CV-930 (DNH)(GJD)
Our File No. 115_003**

Dear Judge DiBianco:

On behalf of Plaintiff, Spero Haritatos, I am requesting telephone discovery conference to address the gross delinquency of Defendant Toys "R" Us, LLC in providing its initial disclosures.

The Rule 26 conference in this case was held on October 12, 2005, and therefore the disclosures were due by October 22, 2005. Not having received the Toys "R" Us disclosures, I sent by e-mail and facsimile a letter to its attorney, John McGowan, dated November 3, 2005, a copy of which is attached hereto as Exhibit "A", requesting that the disclosures be provided. Not having received the disclosures, on November 17, 2005, I spoke with Mr. McGowan by telephone. He explained that he had been in trial for the preceding three weeks. I consented to his request to provide me with the initial disclosures by "next week" and to his request for an extension of time in which to provide responses to Plaintiff's outstanding discovery by December 1, 2005.

As of the time and date of submitting this letter request, I still have not received any initial disclosures from Defendant Toys "R" Us. Accordingly, Plaintiff requests a telephonic discovery conference to address this matter.

Very truly yours,
WALL MARJAMA & BILINSKI LLP

Robert E. Purcell

REP/dms

cc.: John G. McGowan, Esq. (by CM/ECF)
Kim T. Landsman, Esq. (by CM/ECF)

EXHIBIT “A”



101 North Salina Street, Suite 400
Syracuse, New York 13202
Telephone: (315) 425-9000
Facsimile: (315) 425-9114

Robert E. Purcell
E-Mail: rpurcell@wallmarjama.com

November 3, 2005

VIA FACSIMILE (315-422-6825)
& E-MAIL (jmcgowan@bsk.com)

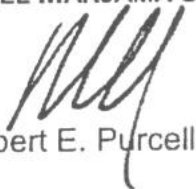
John G. McGowan, Esq.
Bond, Schoeneck & King, PLLC
One Lincoln Center
Syracuse, New York 13202

RE: Spero Haritatos v. Hasbro, Inc. and Toys "R" Us-NY LLC
Civil Action No. 6:05-CV-930 (DNH) (GJD) (N.D.N.Y.)
Our Ref. No. 115_003

Dear John:

I do not believe I have received Toys "R" Us's Initial Disclosures. If you have already provided me with a copy please resend a copy. If you have not provided me with a copy, please do so immediately.

Very truly yours,
WALL MARJAMA & BILINSKI LLP



Robert E. Purcell

REP/dms

Other Documents

6:05-cv-00930-DNH-GJD Haritatos v. Hasbro, Inc. et al

U.S. District Court

Northern District of New York [LIVE - Version 2.5]

Notice of Electronic Filing

The following transaction was received from Purcell, Robert E. entered on 11/28/2005 at 3:20 PM EST and filed on 11/28/2005

Case Name: Haritatos v. Hasbro, Inc. et al

Case Number: 6:05-cv-930

Filer: Spero Haritatos

Document Number: 18

Docket Text:

Letter Motion from Robert E. Purcell for Spero Haritatos, Spero Haritatos requesting telephonic discovery conference submitted to Judge DiBianco. (Attachments: # (1) Exhibit(s) A)(Purcell, Robert)

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1051896954 [Date=11/28/2005] [FileNumber=523733-0]
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dd6f786fb210622fc99b546e142444f4ea0f793929d08edd9d8b4ee4a3cd7]]

Document description:Exhibit(s) A

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1051896954 [Date=11/28/2005] [FileNumber=523733-1]
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f5f095ce8d21af3ae16c7001ff83f54948c4bff472cdd4eda502122805dad]]

6:05-cv-930 Notice will be electronically mailed to:

Kim J. Landsman kjlandsman@pbwt.com, cbelanger@pbwt.com

John G. McGowan jmcgowan@bsk.com, pkeenan@bsk.com

Indranil Mukerji imukerji@wallmarjama.com, closurdo@wallmarjama.com;
cnichols@wallmarjama.com; imukerji@twcny.rr.com

Robert E. Purcell rpurcell@wallmarjama.com, cnichols@cny-iplaw.com; closurdo@cny-iplaw.com

Denis J. Sullivan dsullivan@wallmarjama.com, dszentmiklosi@wallmarjama.com

6:05-cv-930 Notice will be delivered by other means to: